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1501 K STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE 202 736 8000
FACSIMILE 202 736 8711
www.sidley.com
FOUNDED 1866

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WRITER'S DIRECT NUMBER
(202) 736-8164

WRITER'S E-MAIL ADDRESS
ryoung@sidley.com

April 29, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Application by Qwest Communications International Inc. for Authority to
Provide In-Region InterLATA Services in the State of Minnesota, WC
Docket No. 03-11 -- Ex Parte Filing*

Dear Ms. Dortch:

AT&T Corporation ("AT&T") submits this *ex parte* filing to respond to inquiries from the Department of Justice ("DOJ") regarding wholesale billing issues and Qwest's discussion of rejection rates in its April 22, 2003, *ex parte* letter.¹

Billing

The DOJ asked whether all balancing errors in AT&T's bills have been corrected, and whether balancing errors have ceased to be a problem on those bills. The answer to both questions is no. To the extent that Qwest has asserted otherwise, that assertion is flatly untrue. As AT&T described in its opening comments, the electronic CRIS BOS BDT bills that AT&T has received have usually been out of balance ever since Qwest began providing bills in the BOS BDT format in July 2002. Total charges on the bills have been out of balance with the bill detail, with the CRIS paper bills, and with the information on the customer service record. Finnegan Decl. ¶ 57.

These bills have continued to be out of balance for every month this year. For example, as shown in the electronic mail correspondence with Qwest attached hereto as Attachment 1, total charges in the electronic UNE-P bills that AT&T received in March 2003 were out of balance with the bill detail. In addition, the amount on the bills for Other Charges

¹ See *ex parte* letter from Melissa Newman (Qwest) to Marlene H. Dortch, dated April 22A, 2003 ("Qwest April 22 *ex parte*").

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and Credits in the bills did not equal the information on the customer service records. Beginning March 17, 2003, AT&T brought these errors to Qwest's attention, and requested Qwest to correct the bills. Electronic mail messages from AT&T to Qwest regarding these errors, and Qwest's electronic mail responses, are attached hereto as Attachment 1.² Similarly, the details on one electronic UNE-P bill that AT&T received on April 7 did not balance. By electronic mail message sent on April 22, 2003, AT&T advised Qwest of this error and requested that the bill be corrected and resent. A copy of AT&T's electronic mail message is attached hereto as Attachment 2.³ As a result of the out-of-balance condition of these electronic bills, AT&T was unable to process them and was required to rely on the CRIS paper bills for processing.⁴

By themselves, AT&T's recent notifications to Qwest -- including a notification that AT&T sent *only last week* -- belie any claim by Qwest that the out-of-balance condition of AT&T's electronic UNE-P bills is no longer a problem. More fundamentally, in response to these notifications, Qwest has *acknowledged* to AT&T that all of the UNE-P bills that AT&T described in its March and April messages are out of balance. In view of Qwest's admissions, it would be astonishing for Qwest to suggest that the problem of out-of-balance bills no longer exists. The problem persists, and Qwest has made no meaningful effort to correct it despite persistent complaints by AT&T.

Rejection Rates

Like the rejection rates that AT&T experienced for its own orders, the regionwide rejection rates for all orders submitted via the EDI interface by all CLECs were substantially higher in January and February 2003 than in December 2002.⁵ The percentage of LSRs that

² At least one of the bills involved (the bill numbered 320-Z07-0704-0304) was for Minnesota. See Attachment 1, electronic mail message dated March 20, 2003, from Patty McDaniel (AT&T) to Jami Larson (Qwest).

³ The specific out-of-balance April bill referred to in AT&T's electronic mail message (J520-2560-742) is only one of the UNE-P bills that AT&T has received, or is scheduled to receive, from Qwest during April. Because AT&T has not yet processed all of the UNE-P bills that it has received thus far this month, and has yet to receive others, and because AT&T's electronic bills have usually been out of balance since Qwest began transmitting them last July, it is likely that the specific bill referred to in the e-mail is only the first of numerous out-of-balance bills that AT&T will receive from Qwest this month.

⁴ See Finnegan Decl. ¶ 57. Because AT&T's systems cannot process an electronic bill if it is out of balance in any way, AT&T could not process an electronic bill received earlier this month even though the bill was out of balance by only 49 cents. See Attachment 2 hereto.

⁵ Rejection rates for AT&T's orders submitted via the EDI interface increased from 21.7 percent

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were submitted via EDI and auto-rejected (PID PO-4B-1) nearly doubled from December 2002 to January 2003, increasing from 26.33 percent to 48.51 percent. When “manual rejects” are included, the percentage of all CLEC EDI orders that were rejected rose from approximately 30.3 percent in December to 51.8 percent in January – or more than half of all CLEC orders submitted via the EDI interface. Notarianni/Doherty Decl. ¶ 128.

Regionwide rejection rates in February 2003 for EDI orders were also substantially higher than the rates in December. Approximately 38.1 percent of such orders were auto-rejected, and an additional 3.6 percent manually rejected, in February, resulting in a total rejection rate of approximately 41.7 percent.⁶ Although lower than the January rate, the regionwide rejection rate for February was more than 11 percentage points (or nearly 40 percent) higher than that for December.

Typically, Qwest’s April 22 *ex parte* attempts to blame the increase in regionwide rejection rates on “CLEC error,” while absolving itself of any responsibility. Thus, Qwest asserts that the increase in the January rate for auto-rejects was due to an error in the software of one CLEC implementing a new release of an EDI interface, resulting in over 30,000 rejects. Qwest further asserts that although “the CLEC in question subsequently corrected this error in its software,” the February rate for auto-rejects remained high because “a different CLEC” experienced over 21,000 rejects in February, after going into production in January. Qwest April 22 *ex parte* at 1.

Qwest’s explanations do not withstand scrutiny. The newly-released Qwest performance data for March 2003 shows that Qwest’s auto-reject rate for orders submitted via

in December 2003 to 37.5 percent in January 2003 and 42.1 percent in February 2003. Finnegan Decl. ¶ 42. These rates include both orders that were “auto-rejected” (rejected by Qwest’s electronic OSS on a fully automated basis, without manual intervention) and orders that were rejected manually by Qwest after falling out for manual intervention. Although the attachment to Qwest’s April 22 *ex parte* lists rejection rates for AT&T, it computes rejection rates only to the extent that AT&T’s orders were “auto-rejected.” Qwest April 22 *ex parte*, Att. A. Because Qwest has not included manual rejects in its calculation, the rejection rates that it computes for orders that AT&T submitted using the EDI interface are below the actual rejection rates that AT&T experienced for all such orders, whether the rejects were “auto-rejects” or manual rejects. Furthermore, rather than include a single set of calculations for AT&T’s orders, Qwest sets forth separate data for “AT&T” (which consists only of orders for local number portability) and for “Teleport” (which consists of all other orders that AT&T submitted via EDI). *Compare id.* (volumes of orders under “AT&T” column) *with* Finnegan Decl. ¶ 44 (describing range of volumes of LNP orders submitted via EDI between September 2002 and February 2003).

⁶ See *ex parte* letter from Hance Haney (Qwest) to Marlene H. Dortch, dated March 31A, 2003, attachment at 81 (PIDs PO-4B-1 and PO-4B-2).

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EDI increased to 49.16 percent in March – a rate higher even than the 48.51 percent rate in January. The total rejection rate for March (including the 3.15 percent manual rejection rate for that month) was 52.31 percent for orders submitted via the EDI interface – the highest such rate for any month that Qwest included on its newest report.⁷

Qwest cannot simply blame this new increase in the rejection rate on errors by yet “another CLEC.” The increases in the rejection rate have been too persistent, and the rates too high, since December for such an explanation to be plausible. That is particularly true because Qwest’s data for March states that CLECs submitted 153,816 orders via EDI in March – as opposed to the approximately 76,000 orders submitted in December, and the 88,000 orders submitted in both January and February, via that interface. The volumes of total EDI order rejections (both auto-rejects and manual rejects) were approximately 80,000 in March, as opposed to 23,000 in December, 45,000 in January and 36,500 in February. The error of a single CLEC, or even two CLECs, cannot plausibly account for the dramatic increases in EDI order volumes, and order rejections, that occurred in March. It is far more likely that the rejections occurred because Qwest’s OSS lacked the capacity to handle the additional 65,000 orders that CLECs submitted during that month.

Even leaving aside the new March rejection rates, the explanations that Qwest’s April 22 *ex parte* offers for the increases in rejection rates appear to be inconsistent with its Application. As previously indicated, Qwest asserts in its *ex parte* that the January auto-rejection rate for EDI increased due to an “error in the software” of “a CLEC” that implemented a new release of its EDI interface in January. Qwest’s Application, however, states that “Reject rates under PO-4B-2 were particularly high in January because of the actions of a single CLEC that submitted a large number of LSRs with its ACNA, rather than RSID, on the LSRs.” Notarianni/Doherty Decl. ¶ 128 n.141. Moreover, even though the April 22 *ex parte* asserts that this CLEC was responsible for “over 30,000 rejects” in January, this CLEC is not even mentioned in the table in Qwest’s Application describing the individual CLECs who submitted LSRs via EDI, and the volumes that each such CLEC submitted via EDI, during that same month.⁸

⁷AT&T received Qwest’s reported data for March 2003 on April 25, 2003. The Qwest data sets forth monthly data for PO-4B-1 and PO-4B-2 for all months beginning with April 2002.

⁸See Notarianni/Doherty Decl., Exh. LN-OSS-53 (“CLEC LSRs Submitted via IMA-EDI, January 2003”). Even if Qwest’s explanations for the high rejection rates in January and February are correct, they simply confirm that Qwest’s test environment does not reflect its production environment. A test environment which adequately reflected the production environment would have detected the “error in software” that supposedly caused more 30,000 rejects that month when the CLEC in question implemented a new EDI release. See Qwest 22 *ex parte* at 1. Similarly, if the test environment fully mirrored production, the errors that only came to the attention of the “different CLEC” during controlled production, and which caused

Marlene H. Dortch

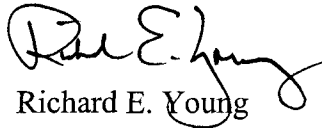
April 29, 2003

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In short, far from providing a satisfactory explanation for the increase in rejection rates in January, Qwest's April 22 *ex parte* simply illustrates its failure to demonstrate that Qwest is not responsible for such increases. The newly-reported rejection rate for March, which exceeds the January rate, belies any notion that the increase can be blamed on the failings of particular CLECs. Indeed, in the face of the substantial order volume increases that occurred during March, the March rejection rates indicate that Qwest's OSS lack sufficient capacity to handle the volumes of orders that can be expected in a truly competitive environment.

In any event, CLECs cannot effectively provide a competitive alternative to Qwest's service in an environment where more than half (or, in AT&T's case, more than 40 percent) of their orders are being rejected by Qwest's OSS when they use the EDI interface for ordering. EDI is the only interface that is suitable for ordering by CLECs which, like AT&T, intend to offer residential service on a mass-market basis. The current high rate of order rejections substantially impede entry costs for such CLECs, thereby impeding their ability to compete in the marketplace. Finnegan Decl. ¶ 47.

Respectfully submitted,


Richard E. Young

cc: Gail Cohen
Gary Remandino
Janice Myles

ATTACHMENT 1

From: McDaniel, Patty J - CSLSM [pattymcdaniel@att.com]
Sent: Monday, March 17, 2003 12:28 PM
To: Jklarso@qwest.com
Cc: Draper, Carolyn - CSLSM; Hayes, Robert W (Bob) - CSLSM
Subject: FW: UNE-P ban 206Z050091242 - out of balance

Jamie,

The March 5th UNE-P bill 206-Z05-0091-242 was received showing an out of balance error. I sent the message below to our System Support Group. Per Norma Cavens, there are too many detail under adjustments. The details don't match the summary.

Can you take a look at this bill and let me know if it can be corrected and resent?

Thanks,

Patty

OUT OF BALANCE ERROR DETAIL

Sum original adjustment amount = -\$1812.42

Bill original adjustment amount = -\$1609.59

difference = \$ 202.83 -- There is a Credit adjustment for this amount showing on the bill in the adjustment section.

> -----Original Message-----

> From: McDaniel, Patty J, CSLSM

> Sent: March 17, 2003 10:20 AM

> To: ABM Systems Support

> Cc: Draper, Carolyn, CSLSM; Hayes, Robert W (Bob), CSLSM

> Subject: UNE-P ban 206Z050091242 - out of balance

>

> System Support,

>

> I have received the mechanized March 5th bill 206-Z05-0091-242. This bill is out of balance. Can someone take a look at this and let me know what needs to be done to correct this bill?

>

> Thanks,

>

> Patty McDaniel

>

> Bill Date: 03/05/2003

> TOA: J

> Co. Code: 9638

>

>

From: McDaniel, Patty J - CSLSM [pattymcdaniel@att.com]
Sent: Thursday, March 20, 2003 1:15 PM
To: Jklarso@qwest.com
Cc: Draper, Carolyn - CSLSM; Hayes, Robert W (Bob) - CSLSM
Subject: FW: March 2003 UNE-P bills out of balance

Importance: High

Jamie,

I received 5 more of the March UNE-P mechanized bills today and all 5 of these bills are also out of balance. I asked system support to give me the actual records that are showing out of balance. Hope this is the info you need to investigate. Please let me know when these bills will be corrected and resent. Also, is there any status on the 206-Z05-0091-242 bill listed below?

Thanks,

Patty

The following bills are out of balance in OC&C. (OCC Summary Record 100513 , Phrase record 103015, USOC record 103020. The phrase & USOC records don't match the summary record).

BANS

402-Z07-0708-061

320-Z07-0704-304

303-111-2560-739

801-111-0702-137

520-111-2560-742--This bill is out of balance in OCC & Adjustments (record numbers listed above for OCC and the Adj records will be the same records as ban 206-Z05-0091-242 listed below).

***I also received Error L2007 - "state not valid" on all 5 of the bills listed above.

> -----Original Message-----

> From: McDaniel, Patty J, CSLSM

> Sent: March 17, 2003 12:28 PM

> To: 'Jklarso@qwest.com'

> Cc: Draper, Carolyn, CSLSM; Hayes, Robert W (Bob), CSLSM

> Subject: FW: UNE-P ban 206Z050091242 - out of balance

>

> Jamie,

>

> The March 5th UNE-P bill 206-Z05-0091-242 was received showing an out of balance error. I sent the message below to our System Support Group. Per Norma Cavens, there are too many detail under adjustments. The details don't match the summary.

>

> Can you take a look at this bill and let me know if it can be corrected and resent?

>

> Thanks,

>
> Patty
>
> OUT OF BALANCE ERROR DETAIL
> Sum original adjustment amount = -\$1812.42
> Bill original adjustment amount = -\$1609.59
> difference = \$ 202.83 -- There is a Credit adjustment for this amount showing
on the bill in the adjustment section.
>
>
> -----Original Message-----
> From: McDaniel, Patty J, CSLSM
> Sent: March 17, 2003 10:20 AM
> To: ABM Systems Support
> Cc: Draper, Carolyn, CSLSM; Hayes, Robert W (Bob), CSLSM
> Subject: UNE-P ban 206Z050091242 - out of balance
>
> System Support,
>
> I have received the mechanized March 5th bill 206-Z05-0091-242. This bill is out of balance. Can
someone take a look at this and let me know what needs to be done to correct this bill?
>
> Thanks,
>
> Patty McDaniel
>
> Bill Date: 03/05/2003
> TOA: J
> Co. Code: 9638
>
>

From: Cavins, Norma L - CSLSM [ncavins@att.com]
Sent: Wednesday, March 26, 2003 1:47 PM
To: Cavins, Norma L - CSLSM; jklarso@qwest.com
Cc: McDaniel, Patty J - CSLSM; Draper, Carolyn - CSLSM; Hayes, Robert W (Bob) - CSLSM
Subject: RE: FW: March 2003 UNE-P bills out of balance

Jamie,

Do you have an idea when the bills will be re-transmitted?

Thanks,
Norma Cavins
ABM System Support
770-750-8875
ncavins@ems.att.com

-----Original Message-----

From: Cavins, Norma L, CSLSM
Sent: Monday, March 24, 2003 2:05 PM
To: 'jklarso@qwest.com'
Cc: McDaniel, Patty J, CSLSM; Draper, Carolyn, CSLSM; Hayes, Robert W (Bob), CSLSM
Subject: FW: FW: March 2003 UNE-P bills out of balance

Jamie,

Please let me know when you have resolved the out of balance issues. If you have any questions, either give me a call or send me an e-mail.

As I stated on the phone Friday, your summary dollars are falling on the 100513 records and the OCC details (\$-34.27) are coming on 10301501 records

-12.54 record seq # 446
-18.73 record seq # 452
-1.00
-1.00
-1.00

\$-34.27

But since we do not have enough OCC \$ we are missing the rest of the detail.

The other bills should be of the same situation except the one that is out in adjustments where the adjustment details come on 1020 records.

Norma Cavins
ABM System Support

770-750-8875
ncavins@ems.att.com

-----Original Message-----

From: McDaniel, Patty J, CSLSM
Sent: Friday, March 21, 2003 1:55 PM
To: Cavins, Norma L, CSLSM
Cc: Hayes, Robert W (Bob), CSLSM; Draper, Carolyn, CSLSM
Subject: FW: FW: March 2003 UNE-P bills out of balance

Norma,

Can you answer Jamie's questions below regarding BOS records?

Thanks,

Patty

-----Original Message-----

From: Jami Larson [mailto:jklarso@qwest.com]
Sent: March 21, 2003 1:38 PM
To: McDaniel, Patty J, CSLSM
Subject: RE: FW: March 2003 UNE-P bills out of balance

let's take the 402 Z07-0708 that you cited in an earlier e-mail-
what are you basing the amount of -34.27 on (please be BOS record
specific)? and what are you basing the amount of 611.52 on (again,
please
be BOS record specific)?

"McDaniel, Patty J, CSLSM" <pattymcdaniel@att.com> on 03/21/2003
10:19:36
AM

To: "Jami Larson" <jklarso@qwest.com>
cc: "Hayes, Robert W (Bob), CSLSM" <rhayes@att.com>, "Draper,
Carolyn,
CSLSM" <cdraper@att.com>

Subject: RE: FW: March 2003 UNE-P bills out of balance

Jamie,

The summary original OCC amount = detail which are the 1030 records
The Bill original OCC amount = total which are the 1005 records

Hope this is what you need. If not, let me know.

Patty

-----Original Message-----

From: Jami Larson [mailto:jklarso@qwest.com]

Sent: March 21, 2003 11:36 AM

To: McDaniel, Patty J, CSLSM

Subject: RE: FW: March 2003 UNE-P bills out of balance

Patty,

Could you define your terms - summary original OCC amt/bill original OCC amt - please.

Do they equate to a specific BOS data element? If so, which ones?

Which 10-30 record do they appear on?

Sorry about the confusion, but we're not able to find what you are specifying.

Thanks!

"McDaniel, Patty J, CSLSM" <pattymcdaniel@att.com> on 03/21/2003
05:37:22
AM

To: "Jami Larson" <jklarso@qwest.com>

cc: "Draper, Carolyn, CSLSM" <cdraper@att.com>, "Hayes, Robert W
(Bob),
CSLSM" <rhayes@att.com>

Subject: RE: FW: March 2003 UNE-P bills out of balance

Jamie,

These are the dollar amounts that show on the "out of balance" error.
Let me know if you need more information.

Thanks,

Patty

402-Z07-0708-061

Summary original OCC Amt -\$34.27

Bill original OCC amt \$611.82

320-Z07-0704-304
Summary original OCC Amt -\$331.12
Bill original OCC amt \$2,724.97

303-111-2560-739
Summary original OCC Amt -\$1.42
Bill original OCC amt \$18,559.91

801-111-0702-137
Summary original OCC Amt \$0.00
Bill original OCC amt \$13,604.63

520-111-2560-742
Summary original OCC Amt -\$10.80
Bill original OCC amt \$13,199.40
Summary original ADJ amount \$426.07
Bill original ADJ amount \$457.62

** Jamie, I am not sure what information you will need to investigate the "state not valid" error that we received on all 5 of these bills. Let me know what you need.

Thanks,

Patty

-----Original Message-----

From: Jami Larson [mailto:jklarso@qwest.com]
Sent: March 20, 2003 8:03 PM
To: McDaniel, Patty J, CSLSM
Subject: Re: FW: March 2003 UNE-P bills out of balance

Patty,
Can you give me some specific \$ amounts? That will make it easier for us to troubleshoot.

"McDaniel, Patty J, CSLSM" <pattymcdaniel@att.com> on 03/20/2003 11:14:40 AM

To: <Jklarso@qwest.com>
cc: "Draper, Carolyn, CSLSM" <cdraper@att.com>, "Hayes, Robert W (Bob), CSLSM" <rhayes@att.com>

Subject: FW: March 2003 UNE-P bills out of balance

Jamie,

I received 5 more of the March UNE-P mechanized bills today and all 5 of these bills are also out of balance. I asked system support to give me the actual records that are showing out of balance. Hope this is the info you need to investigate. Please let me know when these bills will be corrected and resent. Also, is there any status on the 206-Z05-0091-242 bill listed below?

Thanks,

Patty

The following bills are out of balance in OC&C. (OCC Summary Record 100513 , Phrase record 103015, USOC record 103020. The phrase & USOC records don't match the summary record).

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303-111-2560-739

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520-111-2560-742--This bill is out of balance in OCC & Adjustments (record numbers listed above for OCC and the Adj records will be the same records as ban

206-Z05-0091-242 listed below).

***I also received Error L2007 - "state not valid" on all 5 of the bills listed above.

> -----Original Message-----

> From: McDaniel, Patty J, CSLSM

> Sent: March 17, 2003 12:28 PM

> To: 'Jklarso@qwest.com'

> Cc: Draper, Carolyn, CSLSM; Hayes, Robert W (Bob), CSLSM

> Subject: FW: UNE-P ban 206Z050091242 - out of balance

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>

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Per

Norma Cavens, there are too many detail under adjustments. The details don't match the summary.

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> Patty

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> difference = \$ 202.83 -- There is a Credit adjustment

for this amount showing on the bill in the adjustment section.

>

>

> -----Original Message-----

> From: McDaniel, Patty J, CSLSM

> Sent: March 17, 2003 10:20 AM

> To: ABM Systems Support

> Cc: Draper, Carolyn, CSLSM; Hayes, Robert W (Bob), CSLSM

> Subject: UNE-P ban 206Z050091242 - out of balance

>

> System Support,

>

> I have received the mechanized March 5th bill 206-Z05-0091-242. This bill is out of balance. Can someone take a look at this and let me know what needs to be done to correct this bill?

>

> Thanks,

>

> Patty McDaniel

>

> Bill Date: 03/05/2003

> TOA: J

> Co. Code: 9638

>

>

ATTACHMENT 2

From: McDaniel,Patty J - CSLSM [pattymcdaniel@att.com]
Sent: Tuesday, April 22, 2003 9:55 AM
To: Jlarson@qwest.com
Cc: Hayes,Robert W (Bob) - CSLSM; Copeland,Sue J - CSLSM
Subject: FW: 9636 out of balance bill

Jami,

The 04/07/03 UNE-P bill J520-111-2560-742 is out of balance. Please see reply from Norma Cavens below. Per Norma, the 10051300 record should show \$259,614.83 instead of \$259,615.32. Please let me know if you will be able to correct and resend this bill.

Thanks,

Patty

> -----Original Message-----

> From: Cavins, Norma L, CSLSM

> Sent: April 22, 2003 9:33 AM

> To: McDaniel, Patty J, CSLSM

> Cc: ABM Systems Support

> Subject: 9636 out of balance bill

>

> Patty,

>

> You were exactly correct. The totals do not add up.

>

> MAC \$220797.83

> OCC 14571.30

> TAX 518.27

> Usage 23727.43

>

> total current charges = \$259614.83

>

>

> They have \$259615.32 on their CABS record (10051300 record) in total current charge field.

>

> If you have questions, let me know.

>

> Norma

> X 8875